JOINT STIPULATION AND [PROPOSED] ORDER OF DISMISSAL OF ALL CLAIMS OF PLAINTIFF AGAINST DEFENDANT APL MARINE SERVICES, LTD.

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that Plaintiff CEFERINO GALEON and Defendant APL MARINE SERVICES, LTD., through their respective and duly authorized counsel, hereby agree and stipulate to the dismissal with prejudice and without fees or costs of all claims which were asserted or which could have been asserted, by Plaintiff against Defendant APL MARINE SERVICES, LTD. in the above-captioned action, under the authority of Fed. R. Civ. Proc. 41(a)(2).

WHEREFORE, the Parties respectfully request that the Court sign and enter the Order of Dismissal set forth below dismissing Plaintiff's claims against APL MARINE SERVICES, LTD., with prejudice and without fees or costs to either party, under the authority of Fed. R. Civ. Proc. 41(a)(2).

Dated: January 25, 2019 DISCON LAW FIRM

> /s/ Thomas M. Discon By: THOMAS M. DISCON Attorneys for Plaintiff CEFERINO GALEON

Dated: January 25, 2019 GORDON REES SCULLY MANSUKHANI, LLP

> By: /s/ Andrew I. Port Attorneys for Defendant APL MARINE SERVICES, LTD.

CERTIFICATION OF SIGNATURES

I attest that the content of this document is acceptable to all persons above, who were required to sign it.

/s/ Andrew I. Port

Case No. 8:17-cv-00615-JVS-KES

JOINT STIPULATION AND [PROPOSED] ORDER OF DISMISSAL OF ALL CLAIMS OF PLAINTIFF AGAINST DEFENDANT APL MARINE SERVICES, LTD.

Gordon Rees Scully Mansukhani, LLP 275 Battery Street, Suite 2000 San Francisco, CA 94111

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that Plaintiff CEFERINO GALEON's claims against APL MARINE SERVICES, LTD., are dismissed with prejudice and without fees or costs to either party.

Dated: January 25, 2019

Hon. James V. Selna United States District Judge

Case No. 8:17-cv-00615-JVS-KES